

IN THE
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
7-28-2008
JUL 28 2008
MB

UNITED STATES OF AMERICA ex rel.
MILTON JONES

Petitioner,

v.

TERRY McCANN,

Respondent,

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

No. 08 C 2057

The Honorable
Elaine E. Bucklo,
Judge Presiding.

MOTION FOR EXTENSION OF TIME TO REPLY TO RESPONDENT ANSWER,
AND A REQUEST FOR A COURT ORDER TO THE LAW LIBRARY

NOW COMES PETITIONER, Milton Jones R29598. PRO SE,
and moves this Court for a Ninety(90) day extension of time from
July 23, 2008. to October 20, 2008, in which to file a reply to
respondent's Answer. STATEVILLE CORR. CENTER IS ON A LEVEL ONE
LOCKDOWN.

An affidavit in support of this motion is attached.

Respectfully submitted,

BY: Milton Jones R29598
Milton Jones R29598 PRO SE
Stateville Corr. Center.
P.O. BOX 112
Joliet Il. 60434

CASE 1:08-cv-02057

Dated 07/20/08 2 of 5

STATE OF ILLINOIS)
)SS
 COUNTY OF COOK)

AFFIDAVIT

I, Milton Jones, being first duly sworn upon oath, depose and state:

1. Petitioner reply is currently due on August 8, 2008.

This is petitioner's first request for an extension of time in this action.

2. Petitioner received Respondent's Answer from Lisa Madigan on July 17, 2008. **LEGAL MAIL RECEIPT IS ATTACHED WITH THIS AFFIDAVIT.**

3. On page 1 of 27 of Respondent's Answer, **STATES: BACKGROUND 1.** Petitioner Milton Jones is identified as prisoner R29598 and is in the custody of Terry McCann, Warden of Stateville Corr. Center in Joliet Il. But on a very big envelope that Petitioner received with Respondent's answer was lable as Petitioner's name and a false #K51342 and was sent to Dixon CC, Document is attached.

4. Stateville CC, went on Lockdown June 27, 2008, and came off on Thursday July 17, 2008, and went right back on Lockdown Saturday July 19, 2008, This Lockdown will last for a very long time because of a Staff Assault, and Petitioner, and all other inmates have to be in the Cell 24hours a day, intill the Lockdown is over with.

5. Petitioner has a Legal Box in the Law Library, under Line 13 R29598, in that Box is all Petitioner legal documents that he needs to reply to his Petition, and the only way to get to them documents, is when Stateville CC go on a level four Lockdown, and Petitioner needs a Court order to do that. Right now Stateville CC is on a Level one Lockdown.

6. Petitioner also have to get Assistance from the Law Library to look up case law and Petitioner has a list of words out of respondent's Answer that has to be look up in a Law Dictionary, before petitioner can understand what the respondent's answer is saying, petitioner have a list waiting to get the definitions of these words from the Law Library.

7. On page 13 of 27 of respondent's Answer, States about the psychiatrist that examined petitioner, but respondent's lift out the part about petitioner having a learning disorder.

8. Petitioner neighbor who perpared his Habeas Corpus petition, has been moved to another cell, and Petitioner do not have anyone on the same gallery he's on to help him.

9. This request is made in good faith and not for the purpose of delay. Petitioner do not know how long Stateville CC will be on Lockdown.

WHEREFORE, for the foregoing reasons, petitioner request that this Court grant him an extension of time up to and including October 20, 2008, in which to reply, and also grant him a Court Order to the Law Library.
FURTHER AFFIANT SAYETH NOT.

s/ Milton Jones R29598
Milton Jones R29598 PRO SE
Stateville Corr. Center.
P.O. BOX 112
Joliet Il. 60434

LIST OF DEFINITIONS NEEDED FOR EACH WORD

- | | |
|----------------------------|-------------------------------------|
| 1. PLA | 26. bolstered |
| 2. incompleteness | 27. bald |
| 3. inaccuracies | 28. reassertion |
| 4. exhausted | 29. assailants |
| 5. barred | 30. ligature marks |
| 6. pursued | 31. black letter law |
| 7. defaulted | 32. impeached |
| 8. collateral action | 33. documentary, biological |
| 9. appropriate | 34. indistinguishable |
| 10. subsequent PLA | 35. rebutted |
| 11. inadequate inquiry | 36. adjudication |
| 12. forfeited | 37. presumption |
| 13. miscarriage of justice | 38. highly probable |
| 14. impediment | 39. distinct |
| 15. dimensions | 40. potential |
| 16. concededly meritorious | 41. reliance |
| 17. prevail | 42. evaluation |
| 18. exception | 43. compelled |
| 19. paginated | 44. tactical |
| 20. external impediment | 45. sufficiently |
| 21. analysis | 46. specific acts, <u>omissions</u> |
| 22. exaggerating | 47. evaluates |
| 23. distorting | 48. analyzed |
| 24. exculpatory witnesses | 49. objectively unreasonable manner |
| 25. opposed | 50. litigation |

THIS IS A LIST OF EVERY WORD THAT'S IN Respondent's Answer, Petitioner have to get the definition of these words so he may have a full understanding of what respondent's is saying in this Answer, that petitioner has to reply to.

FROM	LISA MADIGAN Attorney General 100 West Randolph Street Chicago, IL 60601
TO	Milton Jones, No. K51342 REDACTED BENTON/PO BOX CHICAGO, IL 60621

LEGAL MAIL RECEIPT

☒ PACKAGE

STATEVILLE CORRECTIONAL CENTER, JOLIET, IL 60434

RESIDENT Jones, M REGISTER NO 20598 LOCATION C 10-57

FROM MAIL OFFICE DATE 7/17/08 RE-ROUTE _____

LEGAL MAIL FROM: LISA Madigan

SIGNATURES:

OFFICER HANDING OUT LEGAL MAIL

DATE

7-17-08

INMATE RECEIVING LEGAL MAIL

DATE

7-17-08

() CERTIFIED () EXPRESS () FED EX () UPS () DELIVERY CONFIRMATION

PLEASE RETURN THIS FORM TO THE MAIL OFFICE. THANK YOU.